

FILED
U.S. DISTRICT COURT
MIDDLE DISTRICT OF TENN.
OCT 02 2024
BY Jm
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
) NO. 3:24-cr-00178
v.)
)
[1] REYNALDO SALINAS-CRUZ) 18 U.S.C. § 371
[2] SOPHIA RODAS) 8 U.S.C. § 1325(c)

I N D I C T M E N T

COUNT ONE

THE GRAND JURY CHARGES:

Beginning not later than in or about September 2023, the exact date being unknown to the Grand Jury, and continuing through at least on or about May 17, 2024, in the Middle District of Tennessee and elsewhere, the defendants, **[1] REYNALDO SALINAS-CRUZ**, and **[2] SOPHIA RODAS**, did knowingly combine, conspire, confederate, and agree with each other, and with others known and unknown to the Grand Jury, to commit certain offenses against the United States, including, but not limited to, knowingly and unlawfully entering into marriage for the purpose of evading a provision of the immigration laws of the United States, in violation of Title 8, United States Code, Section 1325(c).

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND FURTHER JURY CHARGES:

On or about October 6, 2023, in the Middle District of Tennessee, the defendant, **REYNALDO SALINAS-CRUZ**, an alien in the United States, did knowingly and unlawfully enter into marriage for the purpose of evading a provision of the immigration laws of the United States.

In violation of Title 8, United States Code, Section 1325(c).

A TRUE BILL

[REDACTED] _____
FOREPERSON

HENRY C. LEVNTIS
UNITED STATES ATTORNEY

Josh Kurtzman
JOSH KURTZMAN
ASSISTANT UNITED STATES ATTORNEY